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ILL. C. C. DOCKET NO. 01-0701

IP cross EXHIBIT NO. 5

WITNESS Eric Lounsberry

DATE 10-1-02 REPORTER Cad

Docket No. 01-0701
Staff's Response to
Illinois Power Company's
First Data Request
Revised Response

Directed to Eric Lounsberry

REQUEST #34:

Mr. Lounsberry states that "After reducing its manpower levels, IP's ability to identify and act upon problems at its storage fields declined (ICC Staff Exhibit 2.00, page 39)."

- a) What is the basis for Mr. Lounsberry's apparent understanding that the Shanghai and Hillsboro fields did not have supervisors during the period that the events referenced in his testimony occurred? If this is not his understanding, what is?
- b) Provide Mr. Lounsberry's understanding of the functions performed by prior supervision which are not being performed by current work teams. Provide the basis for this understanding.
- c) Provide a detailed listing of all visits to IP's gas storage facilities by Mr. Lounsberry during his tenure at the ICC.
- d) Did Mr. Lounsberry develop this assertion on his own? If not, with whom did Mr. Lounsberry discuss this issue? Please describe all such discussions in detail.

RESPONSE #34 (Revised):

- a) *Mr. Lounsberry's statement does not state or assume that the Shanghai or Hillsboro storage fields do not have supervisors. Mr. Lounsberry's understanding, based upon the Company's response to Staff data request ENG 2.120 from the instant proceeding and 2.80 from Docket No. 00-0714, is that there is currently one storage field supervisor.*
- b) *Mr. Lounsberry has not performed a review of activities undertaken by current supervision versus past supervision. Therefore, Mr. Lounsberry does not know what, if any, functions are not being performed by current supervision that were performed by prior supervision.*
- c) *Mr. Lounsberry's only visits to Illinois Power gas storage facilities occurred in 2001 when he visited the Freeburg and Hillsboro storage fields.*
- d) *Yes.*